

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

1 TOM PLUMBER GLOBAL INC.	:	Case No.: 1:25-CV-00396
	:	
Plaintiff,	:	Judge Jeffery P. Hopkins
	:	
v.	:	
	:	
BLUE RIDGE PLUMBING AND DRAIN	:	
LLC, et al.,	:	
	:	
Defendants.	:	

PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY

Pursuant to Rules 26, 30, 33, and 34 of the Federal Rules of Civil Procedure, Plaintiff 1 Tom Plumber Global Inc. (“1 Tom Plumber”), by and through counsel, respectfully moves for an Order of expedited discovery in this case so that the parties can promptly prepare for a hearing on 1 Tom Plumber’s Motion for Preliminary Injunction. 1 Tom Plumber requests that the Court order Defendants Blue Ridge Plumbing and Drain LLC, Josh Warren, Toni Warren, and Michael Perdue to provide their responses to 1 Tom Plumber’s discovery requests within seven (7) days after service of the same and to produce any party witness for a deposition reasonably in advance of the Preliminary Injunction Hearing.

Attached is a Memorandum in Support of the instant Motion, a proposed order granting the Motion, Plaintiff’s First Set of Interrogatories and Requests for Production of Documents Directed to Defendant Blue Ridge Plumbing and Drain LLC, Plaintiff’s First Set of Interrogatories and Requests for Production of Documents Directed to Josh Warren and Toni Warren, and Plaintiff’s First Set of Interrogatories and Requests for Production of Documents Directed to Defendant Michael Perdue.

Respectfully submitted,

/s/ Melissa A. Springer

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Counsel for Plaintiff
1 Tom Plumber Global Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing is being served with the Verified Complaint for Temporary Restraining Order, Preliminary Injunction, Permanent Injunction, and Other Relief, upon the following:

Blue Ridge Plumbing and Drain LLC
174 Bradley Branch Road, Ste 3
Arden, NC 28704
Defendant

Josh Warren
201 Brandon Road
Hendersonville, NC 28739
Defendant

Blue Ridge Service Group LLC
174 Bradley Branch Road, Suite 4
Arden, NC 28704
Defendant

Toni Warren
201 Brandon Road
Hendersonville, NC 28739
Defendant

Warren Restoration, LLC
9 Legend Drive
Arden, NC 28704
Defendant

Michael Perdue
4 Eola Avenue
Asheville, NC 28806
Defendant

TLC Properties LLC
201 Brandon Road
Hendersonville, NC 28739
Defendant

Trina Ellison
174 Bradley Branch Rd, Ste 3
Arden, NC 28704
Defendant

TLC Service Group, LLC
174 Bradley Branch Road, Suite 5
Arden, NC 28704
Defendant

Piedmont Plumbing and Drain, LLC
9 Legend Drive
Arden, NC 28704
Defendant

/s/ Melissa A. Springer
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